



Foxpointe Centre Building One 201 South Johnson Road, Suite 303 Houston, PA 15342-1351

Tel. (724) 746-9550 Fax (724) 873-9013

April 17, 2015

## VIA: US MAIL and email: rogers.joan@epa.gov

Attn.: Joan Rogers
Water Enforcement & Compliance Branch (WV-15J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

REF: Docket No. V-W-15-308-11

Dear Ms. Rogers:

Attached is the Response of Campbell Transportation Company, Inc. to the Request For Information issued pursuant to Section 308(a) of the Clean Water Act and received by the company on April 13, 2015.

Very truly yours,

Daniel J. Kulbieda

Vice President of Finance & Information Systems

cc: Nicole Cantello

Office of Regional Counsel

Water Enforcement and Compliance Assistance Branch

U.S. Environmental Protection Agency, Region 5

77 West Jackson Boulevard

Chicago, Illinois 60604-3590

Email: Cantello.nicole@epa.gov

David M. Flannery

Kathy G. Beckett

Steptoe & Johnson PLLC

P.O. Box 1588

Charleston, WV 25326-1588

304-353-8000

Email: <u>Dave.flannery@steptoe-johnson.com</u>

Email: Kathy.beckett@steptoe-johnson.com

Ronald K. Corigliano – Campbell Transportation Company, Inc.

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:	)	Docket No. V-W-15-308-11
	)	
Campbell Transportation Company	)	
	)	
	)	Proceeding under Section 308(a) of
	)	the Clean Water Act, as amended,
	)	33 U.S.C. § 1318(a)
UNDER THE VESSEL GENERAL	)	
PERMIT FOR DISCHARGES	)	
INCIDENTAL TO THE NORMAL	)	
OPERATION OF VESSELS (VGP)	)	
	)	
	)	

## **RESPONSE TO REQUEST FOR INFORMATION**

The following is a complete response to each of the questions or requests provided to Campbell Transportation Company, Inc. ('Campbell') in the above referenced matter by letter dated April 3, 2015, and received by Campbell on April 13, 2015 (the "Request").

With respect to paragraphs 1 through 20 of the Request, Campbell understands that these are statements of law or fact offered by USEPA and that it is not necessary for Campbell to respond to any of them. Campbell, therefore, neither admits nor denies their contents.

With respect to paragraph 21 of the Requests, Campbell certifies its intent to comply with the Request.

With respect to paragraph 22, Campbell states that it has no records, information or knowledge concerning the stated request.

With respect to paragraph 23, Campbell states that it has no records, information or knowledge concerning the stated request.

With respect to paragraph 24, Campbell states that it has no records, information or knowledge concerning the stated request.

With respect to paragraph 25, Campbell states that it has no records, information or knowledge concerning the stated request.

With respect to paragraph 26, Campbell states that it has no records, information or knowledge concerning the stated request.

With respect to paragraph 27, Campbell states that it has no such records.

With respect to paragraph 28, Campbell is pleased to submit this response as requested.

With respect to paragraph 29, Campbell does not wish to claim as confidential any part of this response.

With respect to paragraph 30, the undersigned signatory on this response hereby certifies that all written statements submitted pursuant to this Request for Information are true and accurate to the best of the signatory's knowledge and belief.

With respect to paragraphs 31 through 33 of the Request, Campbell understands that these are statements of law or fact offered by USEPA and that it is not necessary for Campbell to respond to any of them. Campbell, therefore, neither admits nor denies their contents.

The undersigned signatory hereby certifies that all written statements submitted pursuant to this Request for Information are true and accurate to the best of the signatory's knowledge and belief.

Daniel J. Kulbieda

Vice President of Finance & Information Systems

Campbell Transportation Company, Inc.